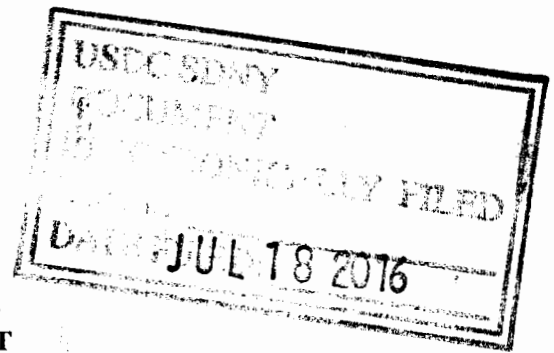




THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

ZACHARY W. CARTER
Corporation Counsel



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July 14, 2016

BY ECF

Honorable Judge George B. Daniels
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED:
George B. Daniels
George B. Daniels, U.S.D.J.
JUL 18 2016
Dated: _____

Re: Erickson Cabrera v. City of New York et al.
16 CV 1098 (GBD)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney assigned to the defense of the City and Police Officer Brian Dennis in the above-referenced matter. Defendants write to request a one week extension from Friday July 15, 2016 to Friday July 22, 2016 within which defendants may file our proposed motion to dismiss. The undersigned needs the additional time to attend to a family medical emergency. Defendants also request the deadlines for plaintiff's motion in opposition now due July 29, 2016 be extended to August 5, 2016 and defendants' reply also be extended by a week from August 5, 2016 to August 12, 2016. The oral argument is currently scheduled for August 18, 2016 at 10:30 a.m. Plaintiff's counsel, Gabriel Harvis, Esq., has consented to the extension.

Defendants thank the Court for its consideration in this matter.

Respectfully submitted,

Paul H. Johnson
Paul H. Johnson
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Gabriel Harvis, Esq. (via ECF)
Attorney for Plaintiff
305 Broadway, 14th Floor
New York, New York 10007